

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Blake Lively,

Plaintiff,

-against-

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, STEVE SAROWITZ, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, THE AGENCY GROUP PR LLC, a Delaware Limited Liability Company, JENNIFER ABEL, an individual,

Defendants.
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: Civil Action No. 1:24-cv-10049-LJL
: [rel. 1:25-cv-00449-LJL]
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: **DEFENDANT WAYFARER STUDIOS**
: **LLC’S ANSWER TO COMPLAINT**
:

Defendant WAYFARER STUDIOS LLC (“Defendant” or “Wayfarer”) hereby answers, for itself alone and no others, the Complaint (“Complaint”) filed by Plaintiff Blake Lively (“Plaintiff”) as follows:

THE COMPLAINT’S ALLEGATIONS

1. Answering the allegations in paragraph 1 of the Complaint, Defendant admits that a meeting was convened in New York on January 4, 2024, prior to resuming filming of “It Ends With Us” (the “Film”), and that the attendees of the meeting included (1) Justin Baldoni, who is the co-chairman and co-founder of Wayfarer Studios LLC, as well as the director, executive producer, and actor in the lead role of Ryle Kincaid; (2) Jamey Heath, who is now Wayfarer’s chief executive officer and a producer of the Film; (3) Ange Gianetti of Sony Pictures Entertainment; (4) Alex Saks, a producer of the Film; (5) Todd Black, a producer of the film; (6)

Plaintiff, who played the role of Lily Bloom in the Film; and (7) Ryan Reynolds. As to all remaining allegations, Defendant denies such allegations.

2. Answering the allegations in paragraph 2 of the Complaint, Defendant denies such allegations.

3. Answering the allegations in paragraph 3 of the Complaint, Defendant denies such allegations.

4. Answering the allegations in paragraph 4 of the Complaint, Defendant admits that it agreed to a list of demands by Plaintiff set forth substantially in the form set forth in Exhibit A to the Complaint. Defendant admits that Wayfarer made the statement quoted in the paragraph. As to all remaining allegations, Defendant denies such allegations.

5. Answering the allegations in paragraph 5 of the Complaint, Defendant admits that the Film was “completed, marketed, and released safely and successfully”; that “[p]roduction of the Film resumed on January 5, and concluded on February 9, 2024; and that “[t]he Film has been a resounding success.” As to all remaining allegations, Defendant denies such allegations.

6. Answering the allegations in paragraph 6 of the Complaint, Defendant admits that during the summer of 2024, Ms. Lively and fellow cast members promoted the Film; and that they were under a contractual obligation to engage in media, press, marketing activities and render promotional services. denies such allegations. As to all remaining allegations, Defendant denies such allegations.

7. Answering the allegations in paragraph 7 of the Complaint, Defendant denies such allegations.

8. Answering the allegations in paragraph 8 of the Complaint, Defendant denies such allegations.

9. Answering the allegations in paragraph 9 of the Complaint, Defendant admits that Jennifer Abel provided publicist services to Wayfarer and Mr. Baldoni; that Wayfarer and Mr. Baldoni retained a crisis communications specialist named Melissa Nathan and her company The Agency Group PR LLC (“TAG”); and that Ms. Nathan delivered a proposal to Mr. Baldoni. As to all remaining allegations, Defendant denies such allegations, including without limitation the allegation that Plaintiff obtained the communications described in the Complaint through legal process, including a civil subpoena.

10. Answering the allegations in paragraph 10 of the Complaint, Defendant denies such allegations.

11. Answering the allegations in paragraph 11 of the Complaint, Defendant admits the allegations that TAG sent communications containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communications and their context are characterized accurately in the Complaint.

12. Answering the allegations in paragraph 12 of the Complaint, Defendant admits the allegations that Mr. Heath and Mr. Baldoni sent communications containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communications and their context are characterized accurately in the Complaint.

13. Answering the allegations in paragraph 13 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of such allegations.

14. Answering the allegations in paragraph 14 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of such allegations.

15. Answering the allegations in paragraph 15 of the Complaint, Defendant admits the allegations that Mr. Baldoni sent communications containing the text set forth in that paragraph.

Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communications and their context are characterized accurately in the Complaint.

16. Answering the allegations in paragraph 16 of the Complaint, Defendant admits the allegations that Jennifer Abel sent communications containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communications and their context are characterized accurately in the Complaint.

17. Answering the allegations in paragraph 17 of the Complaint, Defendant denies such allegations.

18. Answering the allegations in paragraph 18 of the Complaint, Defendant denies such allegations.

19. Answering the allegations in paragraph 19 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of such allegations.

20. Answering the allegations in paragraph 20 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of such allegations.

21. Answering the allegations in paragraph 21 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of such allegations.

22. Answering the allegations in paragraph 22 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of such allegations.

23. Answering the allegations in paragraph 23 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of such allegations.

24. Answering the allegations in paragraph 24 of the Complaint, Defendant denies such allegations.

25. Answering the allegations in paragraph 25 of the Complaint, Defendant denies such allegations.

26. Answering the allegations in paragraph 26 of the Complaint, Defendant admits such allegations.

27. Answering the allegations in paragraph 27 of the Complaint, Defendant admits such allegations.

28. Answering the allegations in paragraph 28 of the Complaint, Defendant admits such allegations.

29. Answering the allegations in paragraph 29 of the Complaint, Defendant admits such allegations.

30. Answering the allegations in paragraph 30 of the Complaint, Defendant admits such allegations.

31. Answering the allegations in paragraph 31 of the Complaint, Defendant admits such allegations.

32. Answering the allegations in paragraph 32 of the Complaint, Defendant admits such allegations.

33. Answering the allegations in paragraph 33 of the Complaint, Defendant admits such allegations.

34. Answering the allegations in paragraph 34 of the Complaint, Defendant admits such allegations.

35. Answering the allegations in paragraph 35 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 35 require a response, Defendant denies such allegations.

36. Answering the allegations in paragraph 36 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 36 require a response, Defendant denies such allegations.

37. Answering the allegations in paragraph 37 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 37 require a response, Defendant denies such allegations.

38. Answering the allegations in paragraph 38 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 37 require a response, Defendant denies such allegations.

39. Answering the allegations in paragraph 39 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 39 require a response, Defendant denies such allegations.

40. Answering the allegations in paragraph 40 of the Complaint, Defendant denies such allegations.

41. Answering the allegations in paragraph 41 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 41 require a response, Defendant denies such allegations.

42. Answering the allegations in paragraph 42 of the Complaint, Defendant admits such allegations.

43. Answering the allegations in paragraph 43 of the Complaint, Defendant admits such allegations.

44. Answering the allegations in paragraph 44 of the Complaint, Defendant admits that production of the Film began in May 2023. As to the remaining allegations, Defendant denies such allegations.

45. Answering the allegations in paragraph 45 of the Complaint, Defendant denies such allegations.

46. Answering the allegations in paragraph 46 of the Complaint, Defendant denies such allegations.

47. Answering the allegations in paragraph 47 of the Complaint, Defendant denies such allegations.

48. Answering the allegations in paragraph 48 of the Complaint, Defendant denies such allegations.

49. Answering the allegations in paragraph 49 of the Complaint, Defendant denies such allegations.

50. Answering the allegations in paragraph 50 of the Complaint, Defendant denies such allegations.

51. Answering the allegations in paragraph 51 of the Complaint, Defendant denies such allegations.

52. Answering the allegations in paragraph 52 of the Complaint, Defendant denies such allegations.

53. Answering the allegations in paragraph 53 of the Complaint, Defendant denies such allegations.

54. Answering the allegations in paragraph 54 of the Complaint, Defendant denies such allegations.

55. Answering the allegations in paragraph 55 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to Plaintiff's state of mind and that Plaintiff's driver remarked that he did not want Plaintiff to be alone with Mr. Baldoni going forward. Defendant denies all of the remaining allegations in the paragraph.

56. Answering the allegations in paragraph 56 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to Plaintiff's state of mind. Defendant denies all of the remaining allegations in the paragraph.

57. Answering the allegations in paragraph 57 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to Plaintiff's state of mind. Defendant denies all of the remaining allegations in the paragraph.

58. Answering the allegations in paragraph 58 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to Plaintiff's state of mind. Defendant denies all of the remaining allegations in the paragraph.

59. Answering the allegations in paragraph 59 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to Plaintiff's or unnamed others' states of mind. Defendant denies all of the remaining allegations in the paragraph.

60. Answering the allegations in paragraph 60 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to Plaintiff's state of mind and to a conversation alleged to have taken place between Lively and an unnamed third party. Defendant denies all of the remaining allegations in the paragraph.

61. Answering the allegations in paragraph 61 of the Complaint, denies such allegations.

62. Answering the allegations in paragraph 62 of the Complaint, Defendant denies such allegations.

63. Answering the allegations in paragraph 63 of the Complaint, lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to the states of mind of Plaintiff and her hair and makeup artists. Defendant denies all of the remaining allegations in the paragraph.

64. Answering the allegations in paragraph 64 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to Plaintiff's state of mind. Defendant denies all of the remaining allegations in the paragraph.

65. Answering the allegations in paragraph 65 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to Plaintiff's state of mind. Defendant denies all of the remaining allegations in the paragraph.

66. Answering the allegations in paragraph 66 of the Complaint, Defendant admits that Baldoni offered to connect Plaintiff with an expert who could offer Plaintiff assistance with probiotics in response to a strep infection and antibiotic treatment. Defendant denies all remaining allegations in the paragraph.

67. Answering the allegations in paragraph 67 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to what an unnamed producer told Plaintiff. Defendant denies all of the remaining allegations in the paragraph.

68. Answering the allegations in paragraph 68 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 68 require a response, Defendant denies such allegations.

69. Answering the allegations in paragraph 69 of the Complaint, Defendant denies such allegations.

70. Answering the allegations in paragraph 70 of the Complaint, Defendant denies such allegations.

71. Answering the allegations in paragraph 71 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 71 require a response, Defendant denies all such allegations, except that Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations relating to Plaintiff's knowledge of complaint processes at Wayfarer.

72. Answering the allegations in paragraph 72 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations.

73. Answering the allegations in paragraph 73 of the Complaint, Defendant denies such allegations.

74. Answering the allegations in paragraph 74 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations regarding what an unnamed actress is alleged to have said to Plaintiff. Defendant denies all of the remaining allegations in the paragraph.

75. Answering the allegations in paragraph 75 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations that Plaintiff

and unnamed others attempted to raise concerns about conduct during filming. Defendant denies all of the remaining allegations in the paragraph.

76. Answering the allegations in paragraph 76 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations that Plaintiff unsuccessfully attempted to raise concerns with Sony. Defendant denies all of the remaining allegations in the paragraph.

77. Answering the allegations in paragraph 77 of the Complaint, Defendant denies such allegations.

78. Answering the allegations in paragraph 78 of the Complaint, Defendant denies such allegations.

79. Answering the allegations in paragraph 79 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 79 require a response, Defendant denies such allegations.

80. Answering the allegations in paragraph 80 of the Complaint, Defendant admits such allegations.

81. Answering the allegations in paragraph 81 of the Complaint, Defendant admits that the Film temporarily halted production in June 2023 as a result of WGA picketing. Defendant denies all of the remaining allegations in the paragraph.

82. Answering the allegations in paragraph 82 of the Complaint, Defendant admits such allegations.

83. Answering the allegations in paragraph 83 of the Complaint, Defendant admits such allegations.

84. Answering the allegations in paragraph 84 of the Complaint, Defendant admits that Plaintiff requested that Wayfarer agree to conditions before returning to production. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations relating to Plaintiff's state of mind. Defendant denies all of the remaining allegations in this paragraph.

85. Answering the allegations in paragraph 85 of the Complaint, Defendant admits such allegations.

86. Answering the allegations in paragraph 86 of the Complaint, Defendant admits that Plaintiff made such a request. Defendant denies all of the remaining allegations in this paragraph.

87. Answering the allegations in paragraph 87 of the Complaint, Defendant admits that counsel for Wayfarer sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

88. Answering the allegations in paragraph 88 of the Complaint, Defendant admits such allegations.

89. Answering the allegations in paragraph 89 of the Complaint, Defendant admits such allegations that the contractual rider attached as Exhibit B to the Complaint contains the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the contractual rider and its context are characterized accurately in the Complaint.

90. Answering the allegations in paragraph 90 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 90 require a response, Defendant denies such allegations.

91. Answering the allegations in paragraph 91 of the Complaint, Defendant admits that a meeting occurred on January 4, 2024, before production resumed, and that it was attended by Mr. Baldoni, Mr. Heath, producer Alex Saks, producer Todd Black, and Sony's Ange Gianetti, as well as Ms. Lively and Mr. Reynolds. Defendant denies all of the remaining allegations in that paragraph.

92. Answering the allegations in paragraph 92 of the Complaint, Defendant denies such allegations.

93. Answering the allegations in paragraph 93 of the Complaint, Defendant denies such allegations.

94. Answering the allegations in paragraph 94 of the Complaint, Defendant denies such allegations.

95. Answering the allegations in paragraph 95 of the Complaint, Defendant admits such allegations.

96. Answering the allegations in paragraph 96 of the Complaint, Defendant admits that Plaintiff and certain other members of the cast promoted the Film in connection with its public release. Defendant denies all of the remaining allegations in this paragraph.

97. Answering the allegations in paragraph 97 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 97 require a response, Defendant denies such allegations.

98. Answering the allegations in paragraph 98 of the Complaint, Defendant admits that Plaintiff and fellow cast members promoted the Film. As to the remaining allegations in this paragraph, Defendant lacks knowledge or information sufficient to form a belief as to the truth of those allegations.

99. Answering the allegations in paragraph 99 of the Complaint, Defendant admits that Baldoni appeared at a trailer-launch event, at which he made flower bouquets, and which included a photo opportunity and Film-branded latte art; and that Baldoni appeared at a pop-up of “Lily Bloom’s” flower shop in Century City, California, and gave tours to influencers, including appearing in a TikTok interview. Defendant denies all of the remaining allegations in this paragraph.

100. Answering the allegations in paragraph 100 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations relating to the state of mind of unnamed cast members of the Film. Defendant denies all of the remaining allegations in this paragraph.

101. Answering the allegations in paragraph 101 of the Complaint, Defendant denies such allegations.

102. Answering the allegations in paragraph 102 of the Complaint, Defendant admits the allegations that Jennifer Abel and Mr. Baldoni sent communications containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communications and their context are characterized accurately in the Complaint.

103. Answering the allegations in paragraph 103 of the Complaint, Defendant admits the allegations that Jennifer Abel sent communications containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communications and their context are characterized accurately in the Complaint.

104. Answering the allegations in paragraph 104 of the Complaint, Defendant denies such allegations.

105. Answering the allegations in paragraph 105 of the Complaint, Defendant denies such allegations.

106. Answering the allegations in paragraph 106 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations relating to the state of mind of unnamed members of Wayfarer's PR team. Defendant denies all of the remaining allegations in this paragraph.

107. Answering the allegations in paragraph 107 of the Complaint, Defendant admits the allegation that Mr. Baldoni sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

108. Answering the allegations in paragraph 108 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegation relating to social media activity by Plaintiff and Mr. Reynolds. Defendant admits the allegation that Mr. Baldoni sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

109. Answering the allegations in paragraph 109 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations relating to conduct by Plaintiff and other unnamed members of the cast for the Film. Defendant admits the allegation that Ms. Abel sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

110. Answering the allegations in paragraph 110 of the Complaint, Defendant admits the allegation that Mr. Baldoni sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

111. Answering the allegations in paragraph 111 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegation relating to Ms. Abel's state of mind. Defendant denies all of the remaining allegations in this paragraph.

112. Answering the allegations in paragraph 112 of the Complaint, Defendant admits the allegation that Ms. Abel sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

113. Answering the allegations in paragraph 113 of the Complaint, Defendant admits the allegation that Mr. Baldoni sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

114. Answering the allegations in paragraph 114 of the Complaint, Defendant denies such allegations, and specifically denies that any communications between Mr. Baldoni and Ms. Abel and the context therefor are characterized accurately in the Complaint.

115. Answering the allegations in paragraph 115 of the Complaint, Defendant denies such allegations.

116. Answering the allegations in paragraph 116 of the Complaint, Defendant admits that Wayfarer and Mr. Baldoni retained Ms. Nathan. Defendant denies all of the remaining allegations in this paragraph.

117. Answering the allegations in paragraph 117 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

118. Answering the allegations in paragraph 118 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

119. Answering the allegations in paragraph 119 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

120. Answering the allegations in paragraph 120 of the Complaint, Defendant denies such allegations.

121. Answering the allegations in paragraph 121 of the Complaint, Defendant admits the allegation that TAG sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

122. Answering the allegations in paragraph 122 of the Complaint, Defendant admits the allegation that Mr. Baldoni sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

123. Answering the allegations in paragraph 123 of the Complaint, Defendant admits the allegation that Ms. Nathan sent a communication containing the price quotes set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

124. Answering the allegations in paragraph 124 of the Complaint, Defendant admits the allegation that Ms. Nathan sent a communication containing the text set forth in that paragraph.

Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

125. Answering the allegations in paragraph 125 of the Complaint, Defendant admits that The Hollywood Reporter published an article containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the article and its context are characterized accurately in the Complaint.

126. Answering the allegations in paragraph 126 of the Complaint, Defendant denies such allegations.

127. Answering the allegations in paragraph 127 of the Complaint, Defendant admits the allegation that Ms. Abel sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

128. Answering the allegations in paragraph 128 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

129. Answering the allegations in paragraph 129 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

130. Answering the allegations in paragraph 130 of the Complaint, Defendant admits the allegation that TAG sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

131. Answering the allegations in paragraph 131 of the Complaint, Defendant admits the allegation that TAG sent a communication containing the text set forth in that paragraph.

Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

132. Answering the allegations in paragraph 132 of the Complaint, Defendant admits the allegation that TAG sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

133. Answering the allegations in paragraph 133 of the Complaint, Defendant admits the allegation that TAG sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

134. Answering the allegations in paragraph 134 of the Complaint, Defendant admits the allegation that Mr. Baldoni sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

135. Answering the allegations in paragraph 135 of the Complaint, Defendant admits the allegation that Mr. Heath sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

136. Answering the allegations in paragraph 136 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

137. Answering the allegations in paragraph 137 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

138. Answering the allegations in paragraph 138 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

139. Answering the allegations in paragraph 139 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

140. Answering the allegations in paragraph 140 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

141. Answering the allegations in paragraph 141 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

142. Answering the allegations in paragraph 142 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

143. Answering the allegations in paragraph 143 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

144. Answering the allegations in paragraph 144 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

145. Answering the allegations in paragraph 145 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

146. Answering the allegations in paragraph 146 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

147. Answering the allegations in paragraph 147 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

148. Answering the allegations in paragraph 148 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

149. Answering the allegations in paragraph 149 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

150. Answering the allegations in paragraph 150 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

151. Answering the allegations in paragraph 151 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

152. Answering the allegations in paragraph 152 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

153. Answering the allegations in paragraph 153 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

154. Answering the allegations in paragraph 154 of the Complaint, Defendant admits the allegation that Ms. Abel sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

155. Answering the allegations in paragraph 155 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

156. Answering the allegations in paragraph 156 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

157. Answering the allegations in paragraph 157 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

158. Answering the allegations in paragraph 158 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

159. Answering the allegations in paragraph 159 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

160. Answering the allegations in paragraph 160 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

161. Answering the allegations in paragraph 161 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

162. Answering the allegations in paragraph 162 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

163. Answering the allegations in paragraph 163 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

164. Answering the allegations in paragraph 164 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

165. Answering the allegations in paragraph 165 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

166. Answering the allegations in paragraph 166 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

167. Answering the allegations in paragraph 167 of the Complaint, Defendant admits that Mr. Baldoni sent a communication linking to a TikTok video. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

168. Answering the allegations in paragraph 168 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

169. Answering the allegations in paragraph 169 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

170. Answering the allegations in paragraph 170 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

171. Answering the allegations in paragraph 171 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

172. Answering the allegations in paragraph 172 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

173. Answering the allegations in paragraph 173 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

174. Answering the allegations in paragraph 174 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

175. Answering the allegations in paragraph 175 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

176. Answering the allegations in paragraph 176 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

177. Answering the allegations in paragraph 177 of the Complaint, Defendant admits that an article bearing the headline set forth in the paragraph was published by Page Six. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the article and its context are characterized accurately in the Complaint.

178. Answering the allegations in paragraph 178 of the Complaint, Defendant admits that an article containing the text set forth in the paragraph was published by Page Six. Defendant

denies all of the remaining allegations in the paragraph, and specifically denies that the article and its context are characterized accurately in the Complaint.

179. Answering the allegations in paragraph 179 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

180. Answering the allegations in paragraph 180 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

181. Answering the allegations in paragraph 181 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

182. Answering the allegations in paragraph 182 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

183. Answering the allegations in paragraph 183 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

184. Answering the allegations in paragraph 184 of the Complaint, Defendant denies such allegations.

185. Answering the allegations in paragraph 185 of the Complaint, Defendant admits the allegation that Mr. Baldoni sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

186. Answering the allegations in paragraph 186 of the Complaint, Defendant admits the allegation that Mr. Baldoni sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

187. Answering the allegations in paragraph 187 of the Complaint, Defendant admits the allegation that Ms. Nathan sent a communication containing the text set forth in that paragraph. Defendant denies all of the remaining allegations in the paragraph, and specifically denies that the communication and its context are characterized accurately in the Complaint.

188. Answering the allegations in paragraph 188 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

189. Answering the allegations in paragraph 189 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

190. Answering the allegations in paragraph 190 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

191. Answering the allegations in paragraph 191 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

192. Answering the allegations in paragraph 192 of the Complaint, Defendant denies such allegations.

193. Answering the allegations in paragraph 193 of the Complaint, Defendant admits such allegations.

194. Answering the allegations in paragraph 194 of the Complaint, Defendant admits such allegations.

195. Answering the allegations in paragraph 195 of the Complaint, Defendant admits such allegations.

196. Answering the allegations in paragraph 196 of the Complaint, Defendant admits such allegations.

197. Answering the allegations in paragraph 197 of the Complaint, Defendant admits such allegations.

198. Answering the allegations in paragraph 198 of the Complaint, Defendant admits such allegations.

199. Answering the allegations in paragraph 199 of the Complaint, Defendant admits such allegations.

200. Answering the allegations in paragraph 200 of the Complaint, Defendant admits such allegations.

201. Answering the allegations in paragraph 201 of the Complaint, Defendant admits that Mr. Baldoni aspires to be not just an ally, but also a fierce advocate for women. Defendant denies all of the remaining allegations in this paragraph.

202. Answering the allegations in paragraph 202 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

203. Answering the allegations in paragraph 203 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

204. Answering the allegations in paragraph 204 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

205. Answering the allegations in paragraph 205 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

206. Answering the allegations in paragraph 206 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

207. Answering the allegations in paragraph 207 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

208. Answering the allegations in paragraph 208 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

209. Answering the allegations in paragraph 209 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

210. Answering the allegations in paragraph 210 of the Complaint, Defendant denies such allegations.

211. Answering the allegations in paragraph 211 of the Complaint, Defendant denies such allegations.

212. Answering the allegations in paragraph 212 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

213. Answering the allegations in paragraph 213 of the Complaint, Defendant denies such allegations.

214. Answering the allegations in paragraph 214 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

215. Answering the allegations in paragraph 215 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

216. Answering the allegations in paragraph 216 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

217. Answering the allegations in paragraph 217 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

218. Answering the allegations in paragraph 218 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

219. Answering the allegations in paragraph 219 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief relating to Plaintiff's state of mind. Defendant denies all of the remaining allegations in this paragraph.

220. Answering the allegations in paragraph 220 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 220 require a response, Defendant denies such allegations.

221. Answering the allegations in paragraph 221 of the Complaint, Defendant denies such allegations.

222. Answering the allegations in paragraph 222 of the Complaint, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations therein.

223. Answering the allegations in paragraph 223 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

224. Answering the allegations in paragraph 224 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 224 require a response, Defendant denies such allegations.

225. Answering the allegations in paragraph 225 of the Complaint, Defendant the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 225 require a response, Defendant denies such allegations.

226. Answering the allegations in paragraph 226 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 226 require a response, Defendant denies such allegations.

227. Answering the allegations in paragraph 227 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 227 require a response, Defendant denies such allegations.

228. Answering the allegations in paragraph 228 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 228 require a response, Defendant denies such allegations.

229. Answering the allegations in paragraph 229 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 229 require a response, Defendant denies such allegations.

230. Answering the allegations in paragraph 230 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 230 require a response, Defendant denies such allegations.

231. Answering the allegations in paragraph 231 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 231 require a response, Defendant denies such allegations.

232. Answering the allegations in paragraph 232 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 232 require a response, Defendant denies such allegations.

233. Answering the allegations in paragraph 233 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 233 require a response, Defendant denies such allegations.

234. Answering the allegations in paragraph 234 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 234 require a response, Defendant denies such allegations.

235. Answering the allegations in paragraph 235 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 235 require a response, Defendant denies such allegations.

236. Answering the allegations in paragraph 236 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 236 require a response, Defendant denies such allegations.

237. Answering the allegations in paragraph 237 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

238. Answering the allegations in paragraph 238 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 238 require a response, Defendant denies such allegations.

239. Answering the allegations in paragraph 239 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 239 require a response, Defendant denies such allegations.

240. Answering the allegations in paragraph 240 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 240 require a response, Defendant denies such allegations.

241. Answering the allegations in paragraph 241 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 241 require a response, Defendant denies such allegations.

242. Answering the allegations in paragraph 242 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 242 require a response, Defendant denies such allegations.

243. Answering the allegations in paragraph 243 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 243 require a response, Defendant denies such allegations.

244. Answering the allegations in paragraph 244 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 244 require a response, Defendant denies such allegations.

245. Answering the allegations in paragraph 245 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

246. Answering the allegations in paragraph 246 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 246 require a response, Defendant denies such allegations.

247. Answering the allegations in paragraph 247 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 247 require a response, Defendant denies such allegations.

248. Answering the allegations in paragraph 248 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 248 require a response, Defendant denies such allegations.

249. Answering the allegations in paragraph 249 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 249 require a response, Defendant denies such allegations.

250. Answering the allegations in paragraph 250 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 250 require a response, Defendant denies such allegations.

251. Answering the allegations in paragraph 251 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 251 require a response, Defendant denies such allegations.

252. Answering the allegations in paragraph 252 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 252 require a response, Defendant denies such allegations.

253. Answering the allegations in paragraph 253 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 253 require a response, Defendant denies such allegations.

254. Answering the allegations in paragraph 254 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

255. Answering the allegations in paragraph 255 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 255 require a response, Defendant denies such allegations.

256. Answering the allegations in paragraph 256 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 256 require a response, Defendant denies such allegations.

257. Answering the allegations in paragraph 257 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 257 require a response, Defendant denies such allegations.

258. Answering the allegations in paragraph 258 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 258 require a response, Defendant denies such allegations.

259. Answering the allegations in paragraph 259 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 259 require a response, Defendant denies such allegations.

260. Answering the allegations in paragraph 260 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 260 require a response, Defendant denies such allegations.

261. Answering the allegations in paragraph 261 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 261 require a response, Defendant denies such allegations.

262. Answering the allegations in paragraph 262 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

263. Answering the allegations in paragraph 263 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 263 require a response, Defendant denies such allegations.

264. Answering the allegations in paragraph 264 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 264 require a response, Defendant denies such allegations.

265. Answering the allegations in paragraph 265 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 265 require a response, Defendant denies such allegations.

266. Answering the allegations in paragraph 266 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 266 require a response, Defendant denies such allegations.

267. Answering the allegations in paragraph 267 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 267 require a response, Defendant denies such allegations.

268. Answering the allegations in paragraph 268 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 268 require a response, Defendant denies such allegations.

269. Answering the allegations in paragraph 269 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

270. Answering the allegations in paragraph 270 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 270 require a response, Defendant denies such allegations.

271. Answering the allegations in paragraph 271 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 271 require a response, Defendant denies such allegations.

272. Answering the allegations in paragraph 272 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 272 require a response, Defendant denies such allegations.

273. Answering the allegations in paragraph 273 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 273 require a response, Defendant denies such allegations.

274. Answering the allegations in paragraph 274 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 274 require a response, Defendant denies such allegations.

275. Answering the allegations in paragraph 275 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 275 require a response, Defendant denies such allegations.

276. Answering the allegations in paragraph 276 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

277. Answering the allegations in paragraph 277 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 277 require a response, Defendant denies such allegations.

278. Answering the allegations in paragraph 278 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 278 require a response, Defendant denies such allegations.

279. Answering the allegations in paragraph 279 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 279 require a response, Defendant denies such allegations.

280. Answering the allegations in paragraph 280 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 280 require a response, Defendant denies such allegations.

281. Answering the allegations in paragraph 281 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 281 require a response, Defendant denies such allegations.

282. Answering the allegations in paragraph 282 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 282 require a response, Defendant denies such allegations.

283. Answering the allegations in paragraph 283 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 283 require a response, Defendant denies such allegations.

284. Answering the allegations in paragraph 284 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

285. Answering the allegations in paragraph 285 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 285 require a response, Defendant denies such allegations.

286. Answering the allegations in paragraph 286 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 286 require a response, Defendant denies such allegations.

287. Answering the allegations in paragraph 287 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 287 require a response, Defendant denies such allegations.

288. Answering the allegations in paragraph 288 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 288 require a response, Defendant denies such allegations.

289. Answering the allegations in paragraph 289 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 289 require a response, Defendant denies such allegations.

290. Answering the allegations in paragraph 290 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 290 require a response, Defendant denies such allegations.

291. Answering the allegations in paragraph 291 of the Complaint, D the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 291 require a response, Defendant denies such allegations.

292. Answering the allegations in paragraph 292 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 292 require a response, Defendant denies such allegations.

293. Answering the allegations in paragraph 293 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

294. Answering the allegations in paragraph 294 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 294 require a response, Defendant denies such allegations.

295. Answering the allegations in paragraph 295 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 295 require a response, Defendant denies such allegations.

296. Answering the allegations in paragraph 296 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 296 require a response, Defendant denies such allegations.

297. Answering the allegations in paragraph 297 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 297 require a response, Defendant denies such allegations.

298. Answering the allegations in paragraph 298 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 298 require a response, Defendant denies such allegations.

299. Answering the allegations in paragraph 299 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 299 require a response, Defendant denies such allegations.

300. Answering the allegations in paragraph 300 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 300 require a response, Defendant denies such allegations.

301. Answering the allegations in paragraph 301 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 301 require a response, Defendant denies such allegations.

302. Answering the allegations in paragraph 302 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

303. Answering the allegations in paragraph 303 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 303 require a response, Defendant denies such allegations.

304. Answering the allegations in paragraph 304 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 304 require a response, Defendant denies such allegations.

305. Answering the allegations in paragraph 305 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 305 require a response, Defendant denies such allegations.

306. Answering the allegations in paragraph 306 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 306 require a response, Defendant denies such allegations.

307. Answering the allegations in paragraph 307 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 307 require a response, Defendant denies such allegations.

308. Answering the allegations in paragraph 308 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

309. Answering the allegations in paragraph 309 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 309 require a response, Defendant denies such allegations.

310. Answering the allegations in paragraph 310 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 310 require a response, Defendant denies such allegations.

311. Answering the allegations in paragraph 311 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 311 require a response, Defendant denies such allegations.

312. Answering the allegations in paragraph 312 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 312 require a response, Defendant denies such allegations.

313. Answering the allegations in paragraph 313 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 313 require a response, Defendant denies such allegations.

314. Answering the allegations in paragraph 314 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 314 require a response, Defendant denies such allegations.

315. Answering the allegations in paragraph 315 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

316. Answering the allegations in paragraph 316 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 316 require a response, Defendant denies such allegations.

317. Answering the allegations in paragraph 317 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 317 require a response, Defendant denies such allegations.

318. Answering the allegations in paragraph 318 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 318 require a response, Defendant denies such allegations.

319. Answering the allegations in paragraph 319 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 319 require a response, Defendant denies such allegations.

320. Answering the allegations in paragraph 320 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 320 require a response, Defendant denies such allegations.

321. Answering the allegations in paragraph 321 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 321 require a response, Defendant denies such allegations.

322. Answering the allegations in paragraph 322 of the Complaint, Defendant incorporates by reference its responses in the foregoing paragraphs.

323. Answering the allegations in paragraph 323 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 323 require a response, Defendant denies such allegations.

324. Answering the allegations in paragraph 324 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 324 require a response, Defendant denies such allegations.

325. Answering the allegations in paragraph 325 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 325 require a response, Defendant denies such allegations.

326. Answering the allegations in paragraph 326 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 326 require a response, Defendant denies such allegations.

327. Answering the allegations in paragraph 327 of the Complaint, the allegations require no response because they merely state a legal conclusion. To the extent that any of the allegations in paragraph 327 require a response, Defendant denies such allegations.

AFFIRMATIVE AND OTHER DEFENSES

By alleging the following affirmative and other defenses, Defendant is not in any way agreeing or conceding that it has the burden of proof or burden of persuasion on any of these issues. As separate and distinct defenses to Plaintiff's Complaint, and each purported cause of action contained therein, Defendant alleges as follows:

FIRST DEFENSE

328. The Complaint, and each claim alleged therein, fails to state facts sufficient to constitute any claim for relief against Defendant.

SECOND DEFENSE

329. The Complaint, and each claim alleged therein, is barred as Plaintiff lacks standing to sue.

THIRD DEFENSE

330. The Complaint, and each claim alleged therein, is barred as Plaintiff has waived her claims.

FOURTH DEFENSE

331. The Complaint, and each claim alleged therein, is barred as Plaintiff is estopped from asserting her claims.

FIFTH DEFENSE

332. The Complain, and each claim alleged therein, is barred as Plaintiff acted and continues to act with unclean hands.

SIXTH DEFENSE

333. The Complaint, and each claim alleged therein, is barred as Plaintiff has not been damaged in any way or at all as a result of any alleged acts or omissions of Defendant.

SEVENTH DEFENSE

334. The Complaint, and each claim alleged therein, is barred in whole or in part by the First Amendment of the Constitution of the United States of America.

EIGHTH DEFENSE

335. The Complaint, and each claim alleged therein, is barred by reason of Plaintiff's consent.

NINTH DEFENSE

336. The Complaint, and each claim alleged therein, is barred as Plaintiff has failed to undertake reasonable measures to mitigate the damages she claims to have incurred. Any recovery by Plaintiff must be diminished to the extent that any alleged damages could have been avoided if such measures had been undertaken.

TENTH DEFENSE

337. Plaintiff is informed and believes, and on that basis alleges, that Plaintiff would be unjustly enriched if recovery were to be had on this Complaint.

ELEVENTH DEFENSE

338. Plaintiff has not been damaged in any amount alleged, or in any amount whatsoever, and is not entitled to any general, compensatory, statutory, punitive, or other damages or any other relief as a result of any of the allegations set forth in the Complaint.

TWELFTH DEFENSE

339. The acts and/or omissions of Plaintiff excused any alleged act or alleged failure to act on the part of Defendant.

THIRTEENTH DEFENSE

340. If Defendant had any alleged obligations or legal dues, which Defendant hereby expressly denies, Defendant has appropriately, completely, and fully performed and discharged any alleged obligations and any alleged legal duties arising out of the matters alleged in the Complaint.

FOURTEENTH DEFENSE

341. The damages and injuries, if any, suffered by Plaintiff were directly and proximately caused solely by the acts or omissions of individuals or entities other than Defendant. The acts and omissions of such other individuals or entities are superseding or intervening causes of loss or damages, if any, suffered by Plaintiff. As a consequence thereof, Plaintiff is barred from recovery against Defendant herein.

FIFTEENTH DEFENSE

342. The damages and injuries, if any, suffered by Plaintiff were directly and proximately caused solely by the reckless, negligent, and wrongful conduct of individuals or entities other than Defendant. As a consequence thereof, Plaintiff is barred from recovery here.

SIXTEENTH DEFENSE

343. The damages and injuries, if any, suffered by Plaintiff were directly and proximately caused solely by the intentional misconduct of individuals or entities other than Defendant. As a consequence thereof, Plaintiff is barred from recovery herein.

SEVENTEENTH DEFENSE

344. The Complaint fails to state facts sufficient to permit an award of punitive damages, and any such award would violate due process.

EIGHTEENTH DEFENSE

345. The Complaint, and each and every cause of action alleged therein, fails to state any facts supporting any claim for punitive or exemplary damages.

NINETEENTH DEFENSE

346. The Complaint, and each and every cause of action alleged therein, is barred in whole or in part because at all material times, Defendant acted in good faith and without malice based upon all relevant facts and circumstances known by Defendant at the time.

TWENTIETH DEFENSE

347. Plaintiff, and her agents, servants, and employees, has failed to bring the causes of action alleged in the Complaint in a timely manner and are therefore barred from recovery against Defendant, in whole or in part, by the equitable doctrine of laches.

TWENTY-FIRST DEFENSE

348. Defendant alleges that in the event it is found in some manner legally liable to Plaintiff as a result of the events or occurrences described in the Complaint, that liability will be solely based upon a derivative, vicarious, or imputed form of liability, not resulting from its own conduct, but instead based upon an obligation imposed upon it by law, or by the conduct of others, and as such the legal liability of Defendant would be proximately caused by the acts or omissions of others and therefore Defendant is entitled to recover contribution from them.

TWENTY-SECOND DEFENSE

349. Defendant alleges that in the event it is found in some manner legally liable to Plaintiff as a result of the events or occurrences described in the Complaint, that liability will be based solely upon a derivative, vicarious, or imputed form of liability, not resulting from its own conduct, but instead based upon an obligation imposed upon it by law, or by the conduct of others, and as such the legal liability of Defendant would be proximately caused by acts or omissions of others and therefore, Defendant is entitled to recover total and complete implied and/or comparable indemnity from them.

TWENTY-THIRD DEFENSE

350. Defendant alleges that in the event it is found in some manner legally liable to Plaintiff as a result of the events or occurrences described in the Complaint, that liability will be based solely upon a derivative vicarious, or imputed form or liability, not resulting from its own conduct, but instead based upon an obligation imposed upon it by law, or by the conduct of others, and as such the legal liability of Defendant would be proximately caused by acts or omissions of others and therefore, Defendant is entitled to recover total and complete equitable indemnity from them.

TWENTY-FOURTH DEFENSE

351. Any injury or damage to Plaintiff, which Defendant specifically denies, was proximately caused by the negligence, recklessness, or intentional conduct of others who acted as one or more of the Plaintiff's legal counsel, agents, or representatives. Accordingly, if any liability is found on the part of Defendant, then Defendant's liability to Plaintiff shall be reduced on the basis of comparative fault.

TWENTY-FIFTH DEFENSE

352. Any injury or damage to Plaintiff, which Defendant specifically denies, was proximately caused by the negligence of Plaintiff.

TWENTY-SIXTH DEFENSE

353. Plaintiff's alleged damages are too speculative to permit recovery in this case.

TWENTY-SEVENTH DEFENSE

354. The Complaint, and each and every cause of action alleged therein, is barred in whole or in part by the doctrine of *in pari delicto*.

TWENTY-EIGHTH DEFENSE

355. The Complaint, and each and every cause of action alleged against Defendant therein, fails to allege facts sufficient to allow recovery of attorney's fees from Defendant.

TWENTY-NINTH DEFENSE

356. Plaintiff's claims based upon California statutes are barred because Plaintiff does not allege that Defendant took any wrongful actions within the State of California.

RESERVATION OF ADDITIONAL DEFENSES

357. Defendant presently has insufficient knowledge or information on which to form a belief as to whether it may have additional, as yet unstated affirmative or other defenses available. Defendant reserves the right to assert additional defenses in the event that discovery indicates they would be appropriate.

PRAYER FOR RELIEF

WHEREFORE, Defendant Wayfarer Studios LLC prays for relief as follows:

1. That the Complaint be dismissed with prejudice, and Plaintiff take nothing herein;
2. That judgment be entered in favor of Defendant and against Plaintiff;
3. For costs of suit incurred in this action; and
4. For such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Defendant demands a jury trial on all causes of action so triable.

Dated: January 24, 2025
New York, NY

Respectfully submitted,

MEISTER SEELIG & FEIN PLLC

By: /s/ Mitchell Schuster
Mitchell Schuster
Kevin Fritz
125 Park Avenue, 7th Floor
New York, NY 10017
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kaf@msf-law.com
Attorneys for Defendants

Dated: January 24, 2025
Los Angeles, CA

**LINER FREEDMAN TAITELMAN
+ COOLEY**

By: /s/ Bryan Freedman
Bryan J. Freedman*
Miles M. Cooley*
Theresa M Troupson*
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